

ATTACHMENT A

STATE OF TEXAS

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HARRIS COUNTY

AFFIDAVIT OF GREGG PHILLIPS

Before me, the undersigned notary, on this day personally appeared Gregg Phillips, whose identity is known to me, who under oath states as follows:

1. My name is Gregg Phillips. I am over 18 years of age, of sound mind, and capable of making this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct;

2. I have read and am familiar with Plaintiff Konnech, Inc.'s Motion to Show Cause and for Contempt Against Defendants Related to the Preliminary Injunction and Direct Orders from the Bench, filed on December 5, 2022, wherein Plaintiff speculates that a file name must have had something to do with Plaintiff because the file contained "PII" in the title.

3. For a period from late January 2021 through October 2022, Catherine Engelbrecht and I were in frequent contact with FBI about many matters relating to election integrity. Konnech was but one of the numerous subjects we discussed.

4. The broader context of the file's transmission to me gave me no reason to believe the file had anything to do with Konnech. Specifically, the source, an anonymous account whose contact screen called itself only "B.", reached out to me in late May 2022 following a brief group chat in Telegram that someone added me to, and that had nothing to do with Konnech. B. said "there is an investigation we have been conducting" and said he would send me "a handful of IDs." He then sent me a file titled

"SORT_BY_STATE_PII_filter_SSN_Dupes_DLN_FINAL_MERGED_WITH_COUNTIES.ods
"



5. I did not attempt to open the file but, rather, asked B. for a synopsis. He responded by indicating that his investigation and the names in the file had to do with Romania.



6. B. later sent me a file titled "Romania Brief Final (1).pdf". However, I continued to put off engaging with B., and eventually B. began to make threatening comments.

7. Almost immediately afterward, I closed down the Telegram account through which the file came. I have no access to the file now.

8. I never attempted to open the document because I feared it could contain malware, because the file and sender were both suspicious, and because the file lacked any evident relevance to me or True the Vote's operations.

9. B's texts to me surrounding his or her transmission of the file to me gave me no reason to think the file had anything to do with Konnech.

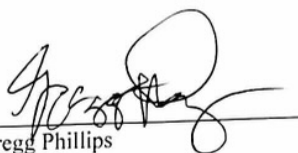
10. The file was not created by me or any other Defendant or anyone associated with us.

11. It was not even clear that the file contained any information at all beyond a title. Subsequent attempts to forward the file revealed no spreadsheet but simply a PNG image file.


12. I have no reason to believe that the letters "PII" in the file name necessarily refer to "personal identifying information", nor that any such information was actually in the file, nor that any of that information related to Konnech, Inc.

13. I passed on the threat and file to Catherine Engelbrecht, who reported the threats and the existence of the file to the FBI.

Further Affiant Sayeth Not.


Gregg Phillips

Subscribed to and sworn before me on this 27th day of December, 2022.


Notary Public in and for the state of Alabama

state : Alabama

county : Shelby :

Ex : 2/19/25

